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May 30, 2017

The Honorable James K. Bredar
United States District Judge
101 West Lombard Street
Baltimore, MD 21201

Re: USA v. Gerald Johnson, et al., JKB-16-0363

Dear Judge Bredar,

Last week, counsel for all defendants held a conference call to discuss common issues surrounding discovery in this case. Thereafter, I spoke with P.J. Martinez about the concerns of defense counsel. Given some issues that have arisen concerning discovery, I write to request that the Court schedule a status conference to address discovery-related issues in this case.

The United States charged nine-defendants in a multi-count indictment with conspiring to participate in a racketeering enterprise that operated in Baltimore City between 2005 and the date of the superseding indictment. The alleged conspiracy spans well over a decade, and the crimes alleged include several homicides and other acts of violence.

On December 22, 2016, this Court filed a Scheduling Order which included the following relevant deadlines:

April 15, 2017	Deadline for the Government to furnish all discovery except Jencks material.
July 10, 2017	Deadline for Defendants' pretrial motions.
October 10-11, 2017	Motions Hearing.
November 13, 2017	Six-Week Jury Trial Begins.

The discovery provided to date is voluminous. Of the discovery produced, there are thousands of pages of paper discovery, Title III wiretaps, as well as video recorded trials from related cases brought in state court. Given the volume and format of the discovery, and with the assistance of Maureen Essex, in early May 2017, undersigned counsel spoke with Kelly Scribner, Assistant National Litigation Support Administrator. Based on the amount of discovery, and other factors, Ms. Scribner suggested that defense counsel seek the assistance of a CJA coordinating discovery attorney for this case. On May 22, 2017, Ms. Scribner notified counsel that no coordinating discovery

attorney was able to assist with this case.

After the conference call with defense counsel, I spoke with P.J. Martinez about the status of discovery. During this discussion, Mr. Martinez indicated, amongst other things, that because the investigation was still ongoing, additional discovery was still to be produced.

Because of these issues, and an approaching Motions and trial date, counsel for all defendants respectfully request that this Court schedule a status conference, with the presence of each defendant, to address the issues raised in this letter. Most, if not all counsel for the defendants are free on either June 5 or 9, 2017. Mr. Martinez is as well. If the Court is free, I'd ask that a status hearing be scheduled so that the parties can assemble to hash out the various issues that have arisen.

Thank you for your time and attention to this matter.

Sincerely,

s/ Michael E. Lawlor

CC: all parties via ECF